

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

FLIR SYSTEMS, INC.,

10-CV-231-BR

Plaintiff,

v.

MOTIONLESS KEYBOARD COMPANY,
an Oregon corporation; and
THOMAS L. GAMBARO, an
individual,

ORDER and NOTICE OF
MOTION TO UNSEAL
PROTECTIVE ORDER IN
MOTIONLESS KEYBOARD V.
MICROSOFT, 04-CV-180-AA

Defendants.

FAROOQ A. TAYAB
MICHAEL J. COLLINS
WILLIAM A. BREWER
Bickel and Brewer
4800 Comerica Bank Tower
1717 Main Street
Dallas, TX 75201
(214) 653-4000

SUSAN D. MARMADUKE

Harrang Long Gary Rudnick, PC
1001 S.W. Fifth Avenue, Suite 1650
Portland, OR 97204-1116
(503) 242-0000

Attorneys for Plaintiff

THOMAS L. GAMBARO

P.O. Box 14741
Portland, OR 97293
(503) 544-0589

Defendant *Pro Se*

JAMES L. BUCHAL

Murphy & Buchal, LLP
2000 S.W. First Avenue, Suite 320
Portland, OR 97201
(503) 227-1011, ext. 2

Attorneys for Defendant Motionless Keyboard Company

TO:

MICROSOFT CORPORATION

John W. Thornburgh

Fish & Richardson
12390 El Camino Real
San Diego, CA 92130
(858) 678-5070

Stephen P. McGrath

One Microsoft Way, Building 8
Redmond, WA 98052
(425) 882-8080

NOKIA INC.

Daniel T. Conrad

Keith B. Davis

Kenneth R. Adamo

Michael J. Newton

Jones Day
2727 North Harwood
Dallas, TX 75201
(214) 969-2963

Christopher J. Lewis

Schwabe Williamson & Wyatt, PC
1600-1900 Pacwest Center
1211 S.W. Fifth Avenue
Portland, OR 97204
(503) 796-2456

SAITEK INDUSTRIES LTD.

Christopher L. Garrett

Robert L. Aldisert

Paul T. Fortino

Perkins Coie, LLP
1120 N.W. Couch Street, 10th Floor
Portland, OR 97209-4128
(503) 727-2078

Joseph W. Price

Snell & Wilmer LLP
600 Anton Boulevard, Suite 1400
Costa Mesa, CA 92626-7689
714-427-7000

Please take notice that in the above-captioned matter, Defendant Thomas L. Gambaro has filed a Motion (#66) for Court Order to Grant Unsealing of Protective Order Documents. A copy of the Motion is attached to this Notice as Exhibit 1. In his Motion, Defendant requests this Court to issue an order to unseal documents that are subject to a protective order issued by Chief Judge Ann L. Aiken in the matter of *Motionless Keyboard Company v. Microsoft*, 04-CV-180-AA. Because Defendant's Motion potentially affects the above-named non-parties to this matter that were parties in case number 04-CV-180-AA, the Court directs the Clerk to send a copy of this Notice and the attached copy of Defendant's Motion (#66) to each of the above-named non-parties.

The Court hereby gives notice to each of the above-named non-parties that each of them has the opportunity to provide written objections to Defendant's Motion by filing same in this action, with copies served on all parties to this action, **no later than October 29, 2010**. Defendant Gambaro's Reply to any such objections is due **no later than NOON, November 12, 2010**. The Court will hear argument on Defendant's Motion on November 19, 2010, at 9:00 a.m. in Courtroom 14A of the Mark O. Hatfield United States Courthouse. Any non-party to this action who has filed an objection to Defendant's Motion may be heard at that time.

IT IS SO ORDERED.

DATED this 9th day of September, 2010.

/s/ Anna J. Brown

ANNA J. BROWN
United States District